

1 **JENNY L. FOLEY, Ph.D., ESQ.**
2 Nevada Bar No. 9017
3 E-mail: jfoley@hkm.com
4 **MARTA D. KURSHUMOVA, ESQ.**
5 Nevada Bar No. 14728
6 E-mail: mkurshumova@hkm.com
7 **HKM EMPLOYMENT ATTORNEYS LLP**
8 1785 East Sahara, Suite 300
9 Las Vegas, Nevada 89104
10 Tel: (702) 625-3893
11 Fax: (702) 625-3893
12 *Attorneys for Plaintiff*

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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 KEITH PAUL, an Individual,
10 vs.
11 CITY OF HENDERSON, DOES I -X; ROE
12 CORPORATIONS I -X,
13 Defendant.

14 CASE NO.: 2:19-cv-00996-GMN-DJA

15

16 **STIPULATION AND ORDER FOR**
17 **PLAINTIFF TO FILE AN**
18 **AMENDED COMPLAINT**

19 **(Second Request)**

20

21 IT IS HEREBY STIPULATED by and between the parties hereto through their
22 respective attorneys that Plaintiff Keith Paul may file a First Amended Complaint
23 revising the current causes of action. The filing of said First Amended Complaint would
24 resolve many of the issues discussed in Defendant City of Henderson's Motion to
25 Dismiss (Doc. No. 12).

26

27 1. On July 18, 2019, City of Henderson filed a Motion to Dismiss (Doc. No. 12).
28 Under the parties' Stipulation and Order to Extend Time to Answer or Otherwise
29 Respond to Complaint and to Establish Briefing Schedule (Doc. No. 7),
30 Plaintiff's Opposition to the Motion to Dismiss is due August 12, 2019 and the
31 City of Henderson's Reply is due August 26, 2019.

2. On July 30, 2019, Jenny L. Foley and Marta D. Kurshumova, counsel for Plaintiff, conferred with Brian R. Reeve and Kristina Gilmore, counsel for Defendant City of Henderson, regarding the timing of Plaintiff's Opposition and the City of Henderson's Reply. Counsel for the parties agreed that:

- a. Instead of filing an opposition to Defendant's Motion to Dismiss, Plaintiff would file an amended complaint;
 - b. Said amended complaint would resolve many of the issues raised by Defendant's Motion to Dismiss;
 - c. Plaintiff has until August 12, 2019, to file an amended complaint; and
 - d. Defendant City of Henderson will have until August 26, 2019 to answer or otherwise respond to the First Amended Complaint.

3. On August 12, 2019, Jenny L. Foley and Marta D. Kurshumova, counsel for Plaintiff, conferred with Brian R. Reeve, counsel for Defendant City of Henderson, regarding the timing of Plaintiff's filing of an Amended Complaint and the City of Henderson's Answer. Counsel for the parties agreed that:

- a. Plaintiff has until August 26, 2019, to file an amended complaint; and
 - b. Defendant City of Henderson will have until September 16, 2019 to answer or otherwise respond to the First Amended Complaint.

This document is being electronically filed through the Court's ECF System. In this regard, counsel for Plaintiff hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Defendant's counsel has

1 concurred with the filing of this document; and (3) a record supporting this concurrence
2 is available for inspection or production if so ordered.

3 Dated: August 12, 2019

4 CITY OF HENDERSON

5
6 By: /s/ Brian Reeve
BRIAN R. REEVE (# 10197)
7 Assistant City Attorney
240 Water Street, MSC 144
Henderson, Nevada 89015
Telephone: (702) 267-1231
8 Facsimile: (702) 267-1201
Email:
9 brian.reeve@cityofhenderson.com
Attorney for Defendant
10 City of Henderson

11 Dated: August 12, 2019

12 HKM EMPLOYMENT ATTORNEYS LLP

13
14 By: /s/ Jenny Foley
Jenny L. Foley (#9017)
15 Marta D. Kurshumova (#14728)
1785 East Sahara, Suite 300
Las Vegas, Nevada 89104
Telephone: (702) 625-3893
16 Facsimile: (702) 625-3895
Email: jfoley@hkm.com
Email: mkurshumova@hkm.com
17 Attorneys for Plaintiff
Keith Paul

18 **ORDER**

19 **IT IS SO ORDERED:**

20
21 Dated: August 13, 2019



22
23 United States Magistrate Judge
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